

IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

In re

**Saanil Hospitality Mongos Grill, LLC**

Debtor

Case No

Chapter 11

Judge: Hoffman

AFFIDAVIT OF GANESH RAO IN SUPPORT OF CHAPTER 11 PETITION AND FIRST  
DAY MOTIONS

State of Ohio                }  
County of Franklin        }  
Ganesh Rao, being duly cautioned and sworn says.

1. I am the owner of 51% of Saanil Hospitality Mongos Grill, LLC ("Debtor") in the above-described case.
2. Debtor is a franchised restaurant doing business at 8655 Mason Montgomery Rd. in Mason Ohio. Its headquarters is located at 4110 Bryson Cove Cir., Dublin, OH 43016.
3. Debtor's franchisor is Mongolian Management and Investment Company, LLC, a Michigan LLC.
4. Debtor unsuccessfully filed bankruptcy *pro se* in case In re: Saanil Hospitality BDS Mongos Grill, LLC, Case No:2:14-bk-57821 which this Court dismissed.
5. Debtor has no secured lender, except for IRS.
6. I have recently taken strong measures to improve the financial viability of the debtor. I have:  
(GB – copy and paste from motion for use of cash collateral)
7. The budget of debtor, exhibit A attached to the motion for use of cash collateral, is my best estimate of the current income and expenses of the debtor. It includes current tax payments to IRS and the state of Ohio.

8. Debtor needs immediate authority to use the cash collateral to fund Debtor's day-to-day operations and ultimately achieve a successful reorganization. Specifically, Debtor requires the use of cash collateral for the payment of the operating expenses included in the attached preliminary Budget.
9. Gita Rao, the minority member of Debtor, recently turned in the liquor license of the debtor to the Ohio liquor commission without authority. I am reversing that action.
10. I personally am in the midst of a divorce from Gita Rao, in Franklin County Common Pleas Court – Domestic Relations Division, CASE NO; 14 DR001260.
  - a. I am under great strain trying to manage the Debtor, participate in this Chapter 11, and defend myself in the pending divorce.
  - b. I need the assistance of this Court to allow me to concentrate on creating a successful plan.
11. I have provided counsel with many documents, and I am in the process of producing a few more so that the schedules can be completed. The delay in part was caused by my personal move from my family residence to my new location, which is now also Debtor headquarters. We should have them completed in the next twenty to thirty days. However, if we can, we will file as soon as possible.

Further Affiant saith naught.

  
\_\_\_\_\_  
Ganesh Rao

Sworn to before me and subscribed in my presence January 20, 2015..

  
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Notary Public



Genenia M. Bellner  
Notary Public, State of Ohio  
My Commission Expires 08-05-2018